

Exhibit 11

From: Lutkus, Stacy <Salutkus@mwe.com>
Sent: Monday, October 28, 2024 6:37 PM
To: Resnick, Brian M.; Shpeen, Adam L; McClammy, James I.; Brock, Matthew R.; Sun, Tony; Stroman, Samantha; biglots.dpw.rx
Cc: Azman, Darren; Going, Kristin; akratenstein@mwe.com; Haims, Joel; Asher, Monica; Newsome, Kelly; Combs, Chris; JAlberto; Newman, Stacy; Carnes, Sarah
Subject: In re Big Lots, Inc., et al., Case No. 24-11967 (JKS) (Bankr. D. Del.)
Attachments: 2024-10-28 - Second Set of Document Requests to Debtors.pdf; 2024-10-28 Stipulation and Protective Order DRAFT.docx

Dear Davis Polk Team:

Please see the attached Second Request for the Production of Documents of the Official Committee of Unsecured Creditors Directed to the Debtors.

Separately, but relatedly, given the Committee's outstanding requests for production to third parties who are not beneficiaries of the confidentiality provisions of the *Bylaws of the Official Committee of Unsecured Creditors of Big Lots, Inc. et al.*, we would propose that a protective order is appropriate in these cases. To that end, please see the attached proposed draft. We would request that you provide any comments as soon as possible so that we may, in turn, provide an agreed draft to the U.S. Trustee as soon as possible. (Under the DE local rules, we need to share with the U.S. Trustee four business days prior to filing.)

Finally, we have received a request from a member of the Committee that its counsel be permitted to review produced documents on a PEO basis. Please let us know your client's position on that request – we would be happy to set up a call to discuss if helpful. We are also, of course, available to discuss any of the other foregoing points and/or any of the attached documents at your convenience.

Many thanks,
Stacy

STACY A. LUTKUS
Partner
McDermott Will & Emery LLP One Vanderbilt Avenue, New York, NY 10017-3852
Tel +1 212 547 5304 Email salutkus@mwe.com
[Website](#) | [vCard](#) | [LinkedIn](#)

This message is a PRIVATE communication. This message and all attachments are a private communication sent by a law firm and may be confidential or protected by privilege. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained in or attached to this message is strictly prohibited. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Our [Privacy Policy](#) explains how we may use your personal information or data and any personal information or data provided or made available to us. Thank you.

Please visit <http://www.mwe.com/> for more information about our Firm.